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May 29, 2020

Via ECF

Honorable Sidney H. Stein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

MEMO ENDORSED

Re: Candie Hailey-Means v. City of New York, et al.,
17 CV 5374 (SHS)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, representing the defendants in the above-referenced matter. I write to respectfully request the Court's permission to file certain documents under seal as exhibits to the defendants' motion for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure.

Defendants seek permission to file plaintiff's medical records under seal. These records should not be publicly disclosed in order to preserve plaintiff's privacy under the Health Insurance Portability and Accountability Act, 42 U.S.C. § 1320, *et seq.*, ("HIPAA"). See also Dubose v. Boudreaux, No. 12 Civ. 7633 (KBF), 2014 U.S. Dist. LEXIS 123777, at *2 n.3 (S.D.N.Y. Aug. 20, 2014) ("Defendants appropriately filed plaintiff's medical records under seal").

Additionally, defendants seek permission to file certain policy directives of the Department of Correction (DOC) under seal, as these documents have been designated "Confidential" in the discovery process. While many DOC directives are publicly available,

these particular directives are not. Thus, defendants seek to file them under seal for security purposes and penalogical interests.

I thank the Court for its consideration of this request.

Respectfully submitted,

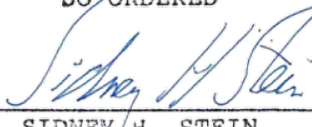
/s

Steve Stavridis
Senior Counsel

cc: **Via ECF**
All Counsel

Application granted.

**Dated: New York, New York
June 4, 2020**

SO ORDERED


SIDNEY H. STEIN
U.S.D.J.